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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SARA KIM NGUYEN, individually,

13 Plaintiff,

14 vs.

15 LANE F. SMITH, M.D., individually; SMITH  
16 SALON, LLC dba Chic La Vie, a Limited-  
Liability Company; SMITH PLASTIC  
17 SURGERY INSTITUTE, PC, a Professional  
Corporation; SMITH PLASTIC SURGERY  
18 BUILDING LLC, a Limited-Liability Company;  
ROE ENTITIES I – V, inclusive,

19 Defendants.  
20

Case No.: 2:21-cv-00213-KJD-BNW

**STIPULATION AND PROPOSED  
ORDER TO EXTEND TIME FOR  
DEFENDANT LANE F. SMITH, M.D.  
TO FILE HIS REPLY TO IN  
SUPPORT OF MOTION TO SEAL  
OR STRIKE  
(Second Request)**

21 Defendant Lane F. Smith, M.D. (hereinafter “Dr. Smith”) by and through his counsel,  
22 Amanda L. Ireland, Esq. and Gabriel L. Grasso, Esq., and Plaintiff, Sarah Kim Nguyen, by and  
23 through her counsel of record Andre M. Lagomarsino, Esq. and Cory M. Ford, Esq., do hereby  
24 agree and stipulate to an additional 3-day extension for Dr. Smith to file a Reply in Support of

1 his Motion to Seal Complaint, or in the Alternative, Motion to Strike Scandalous Immaterial  
2 Matter (Doc. 9) (“Motion to Seal or Strike”) from April 6, 2021 until April 9, 2021.

3 The Complaint was filed on February 9, 2021, the Motion to Seal or Strike was filed on  
4 February 26, 2021, and a hearing on the Motion was set for May 6, 2021 at 10 am.

5 This is Dr. Smith’s second request for an extension of the Motion to Seal or Strike Reply  
6 deadline, and is submitted pursuant to Local Rules IA 6-1, 6-2 and II 7-1. The parties previously  
7 stipulated to extend the time for Plaintiff to respond to the Motion to Seal or Strike from March  
8 12<sup>th</sup> until March 22<sup>nd</sup>. (Doc. 13) The Stipulation was granted on March 15<sup>th</sup>. (Doc. 14) The next  
9 day, March 16<sup>th</sup>, Plaintiff filed her Opposition. (Doc. 15). When counsel participated in the Rule  
10 26(f) conference on March 22, 2021, they agreed an extension for Dr. Smith’s Reply was  
11 appropriate as a matter of professional courtesy, and on March 23<sup>rd</sup> the parties submitted a  
12 stipulation to extend the time for Defendant to file a Reply to his Motion to Seal or Strike to  
13 April 6, 2021. (ECF No. 18). Since then, an Order was entered March 30, 2021 setting an Early  
14 Neutral Evaluation for May 13, 2021 (ECF No. 21), and a Scheduling Order was entered on  
15 April 2, 2021, (ECF No. 22).

16 This extension is requested based on agreements between counsel and this stipulation is  
17 submitted after the specified deadline for the Reply as a result of excusable neglect. Specifically,  
18 lead counsel for Dr. Smith, Amanda L. Ireland, Esq., suffered a major IT hardware failure at her  
19 home office the day the Reply was due, causing delay due to corrupted files and the need to  
20 order, receive and replace computer equipment.

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Accordingly, Dr. Smith shall have up to and including April 9, 2021 to file his Reply in support of the Motion to Seal or Strike.

Dated this 8<sup>th</sup> day of April 2021.

IRELAND LAW GROUP, LLC

*/s/ Amanda L. Ireland*

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*Attorneys for Defendants*

Dated this 8<sup>th</sup> day of April 2021.

LAGOMARSINO LAW

*/s/ Andre M. Lagomarsino*

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*Attorneys for Plaintiff*

**IT IS SO ORDERED:**



**UNITED STATES MAGISTRATE JUDGE**

**Dated: April 13<sup>th</sup>, 2021**